

and applaud the Joint Board's recognition of the educational benefits that participation in consortia with ineligible entities can provide America's high schools.

It is important, however, that universal service benefits not be dependant on who orders the telecommunications services or capabilities. For instance, if a community college subscribes to a particular telecommunications or advanced service to make library resources available to K-12 schools, or to provide courses to K-12 students either on or off campus, it should be provided a universal service discount to the extent that the benefits run directly to eligible secondary schools. Records maintained regarding the use of shared facilities will ensure that unrelated uses of the facilities are not subsidized.

IV. Conclusion

The Joint Commenters commend the Joint Board on its work to ensure that our Nation's public educational institutions are equipped to provide their students with the skills required to compete in an increasingly technology- and education-dependent global economy. In particular, the Joint Commenters strongly support the recommendations that offer advanced services to schools and libraries at discounted rates and that preserve the ability of eligible entities to participate in consortia with public and private institutions that themselves do not qualify for universal service support.

The Joint Commenters, however, also recognize that there are aspects of the Recommended Decision that either affirmatively, or by failure to address specific issues, have the effect of excluding community colleges from the benefits of Congress' universal service initiatives. Moreover, there are recommendations made by the Joint Board that require further analysis, and in some cases require the establishment of safeguards, to ensure that the federal

universal services rules are applied in a competitively-neutral manner. It is based on these convictions, that the Joint Commenters submit these comments for Commission review and urge that their recommendations be appropriately addressed in the rules promulgated in this proceeding.

Respectfully submitted,

**AMERICAN ASSOCIATION OF
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**ASSOCIATION OF COMMUNITY COLLEGE
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